

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA)	
)	
v.)	
)	Dkt. No. 16-CR-10225-DPW
EDWARD J. TUTUNJIAN)	
)	
&)	
)	
EJT MANAGEMENT, INC.)	
_____)	

EDWARD J. TUTUNJIAN'S SENTENCING MEMORANDUM
SUPPLEMENT WITH ADDITIONAL SUPPORT LETTERS

Edward J. Tutunjian hereby files this supplement to his Sentencing Memorandum [Doc. No. 26] with additional letters of support attached hereto as Exhibit 1.

DATED: December 9, 2016

Respectfully submitted,

/s/Andrew Good
Andrew Good
MA BBO #201240
ag@gscboston.com

/s/Philip G. Cormier
Philip G. Cormier
MA BBO #554515
pc@gscboston.com

Good Schneider Cormier
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Boston, MA 02110
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Counsel to Edward J. Tutunjian

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the within document on counsel of record via the ECF system.

Dated: December 9, 2016

/s/ Philip G. Cormier
Philip G. Cormier

Hon. Douglas P. Woodlock
U.S. District court
John Joseph Moakley U.S Courthouse
One Courthouse Way
Boston, MA.02210

Dear Judge Woodlock, My name is Solome Kahsay and I worked in Boston Cab for almost a year and a half. I can definitely say this is the best job I had so far since I came to Boston. I work most of the time in the office with Eddie's wife Nancy and his daughter Mary, helping them with making computer entries and filing paper works. They are some of the nicest people I know in my life. I can say they are the reason why I love my job. I also got to know Eddie when I started working in his company.

Eddie is a good man with wonderful manner and ethics. He always smile and say hi when he sees me and even asks me how my vacation was to make sure if I spent a good trip. I really admire when I saw how Eddie handled his business and I can positively say he is a good person just by observing the environment I work. When I say this I never saw a big business company that keeps employees that have mental problems, elderly people and so many other things, just to try to help others. I can say Eddie cares more about his employees than his success.

These days, I can say many businesses always focus on being successful but it's not like that with Eddie. Eddie always gives priority to making sure that his employees are happy and comfortable with their job responsibilities and his success comes second. I think that's why all employees I know care so much for this business and look it as if it's their own. I always see him smiling and talking with his employees and drivers just like his friends. He used to help them in the afternoon shift at the front window trying to be a good example. I think it's rare to see an owner working with his employees even

Solomekahsay@gmail.com

when there is enough staff. It shows me that he still wants to help the employees and understand what is going on with the drivers. He wants to be accessible.

I never saw Eddie yelling or screaming on his employees or even with his drivers when there is any mistake done. He is always patient when he handle complicated situations. I know an elderly guy who works at the window. He is a nice guy and he has been working in Boston Cab for so many years. On his shift he makes a lot of mistakes but Eddie still keeps him just because he thinks about him and also he wants to help him. He has no family and nobody else. No owner will do this. I can definitely say Eddie is a father for so many needy people. He lives his life for others not just for himself.

I understand that broke the law. He did not do it just to cheat on the government or anything. He helps so many people and for a person that changes many people's lives should get another chance. A person like Eddie is one in a million to find in this world these days so putting Eddie in jail will affect so many people's life. So for the sake of his kind and wonderful family and many other people he really needs to get a second chance. I am sure this is a big lesson for Eddie that teaches him to say no in some situation and since he is a good person I am sure that he is willing to accept your decision and learn from it. And also regarding his condition (diabetics) keeping him in prison for a long time will hurt him and make everyone feel so bad. So I beg you to give him another chance.

Thank you for your consideration in this important time. I am sure this second chance will bring the best out of him and I am sure many will benefit from your benevolence

Sincerely,

Solome Kahsay

A handwritten signature in black ink, appearing to be 'Solome Kahsay', with a stylized, overlapping loop structure.

362 Rindge Ave, Cambridge, MA,02140

Solome kahsay@gmail.com

Solomekahsay@gmail.com

Honorable Douglas P. Woodlock
U.S. District Court
John Joseph Moakley U.S. Courthouse
One Courthouse Way
Boston, MA 02210

Dear Judge Woodlock,

My name is Claudio R. Kraus. I am the proprietor of Geoclassics, a mineral and fossil store located in Faneuil Hall Marketplace for over 34 years. I am presently, and have been for many years, a member of the Merchant Association Board of Directors. Before opening the store I taught economics (specifically econometrics and business cycle theory) at Northeastern University (where I obtained a Ph.D.) and later at Bentley College (now Bentley University).

It is with a heavy heart that I am writing this letter on behalf of Mr. Edward Tutunjian.

I have known Ed for about five years. I have only seen very good things of Ed. His gentleness and modesty at first manifest themselves as shyness, but later I realized that he is, in fact both very warm and very considerate.

I learned of his troubles because I saw an article in the Boston Globe. I was very surprised because the person being described was not the person I knew. I have seen him burdened and sad since that time. I know that this has been something very heavy in his life and his family's life.

I also know that he is going through a number of serious medical conditions because we have discussed some. I am a cancer patient so I understand all too well the heavy burden and consequences not only for the patient but for the whole family, employees and friends. It is difficult enough to survive with illness in a free condition. I would think that being incarcerated would be substantially worse.

I appeal to you, Your Honor, to make something good out of this, as difficult as it may be. I urge you to consider some type of community service for Ed in place of jail time. He is an intelligent, talented, good natured man who can make a contribution to someone in the community. To put him in jail would be a waste of a good man.

I want to thank you Your Honor for taking the time to read my letter.

Sincerely,



Claudio R. Kraus, Ph.D.

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ARMENIAN RELIEF SOCIETY
OF EASTERN USA, Inc.

Մասնաճիւղ / Chapter: ԼԷՕԼԱ ՍԱՍՈՒՆԻ/ LEOLA SASSOUNI

Հասցե / Address: 47 Nichols Ave, Watertown, MA 02472

December 3, 2016

Hon. Douglas P. Woodlock
U.S. District Court
John Joseph Moakley U.S. Courthouse
One Courthouse Way
Boston, MA 02210

Dear Judge Woodlock,

We have known Eddie Tutunjian in a social capacity for many years, and despite his recent transgressions, we have always found him to be an extremely genuine and respectful individual. We know him to be a humble, hardworking family man who has always been community-driven.

Eddie has continuously contributed to the Armenian Relief Society (ARS). The ARS is a charitable organization with chapters worldwide, supporting humanitarian concerns, disaster reliefs, human rights and other social issues. Eddie is incredibly generous and has always felt an obligation to help us. We feel blessed to have received ample support from Eddie over the years; he is truly devoted to helping our ongoing charitable projects.

We ask leniency during his sentencing. He is a decent, dedicated person who is sorely needed at home and in his community. Our organization will provide him and his family moral support during this difficult time.

Thank you for your time and consideration.

Sincerely,

Mayda Melkonian

Chairperson

Harout Jack Samra

434 Catalonia Avenue, Coral Gables, Florida 33134
Tel.: 305-753-2703; Email: HSamra@Gmail.com

November 22, 2016

Hon. Douglas P. Woodlock
U.S. District Court
District of Massachusetts
John Joseph Moakley U.S. Courthouse
One Courthouse Way
Boston, Massachusetts 02210

Dear Judge Woodlock,

I am an attorney and member in good standing of the Florida and New York Bars based in Miami, Florida. I have known Edward Tutunjian for approximately 15 years. In that time, I have spent significant time with Mr. Tutunjian and his family.

I first met Mr. Tutunjian in Miami when he was visiting his oldest daughter, who was a fellow undergraduate at the University of Miami at the time. In the years I have known Mr. Tutunjian, he has always impressed me as an honest, industrious, and humble man. To a large degree, he personifies the American dream, having come to the United States as a young man and achieving success through hard-work and determination.

During the time I have spent with Mr. Tutunjian, I have had the opportunity to witness his innate fairness and generosity, particularly to those who worked for him and his company. I recall one instance when we rode together in a taxi, and – despite the driver's protests – Mr. Tutunjian insisted on paying and generously tipping the driver. On another occasion, I recall Mr. Tutunjian offering financial assistance to a driver who was concerned about a slow shift. It has always been clear to me – not least based on my personal observation of Mr. Tutunjian's interactions with drivers for his companies – that he never lost perspective despite his success. He identified with the drivers and was always fair and courteous in his personal interactions with them. In the time I have spent with him in Boston, he is frequently approached and greeted warmly by former drivers, many of whom – like him – began their American journey at the wheel of a taxi cab.

Knowing Mr. Tutunjian, it comes as no surprise that he has accepted responsibility for the wrongs currently before the Court. This is consistent with his values and fundamentally honorable character. I hope that Your Honor will consider this when determining his punishment. I am confident that, if given the opportunity, he will continue to meaningfully contribute to his community.

Please do not hesitate to contact me if I can be any further assistance to the Court.

Respectfully,



Harout Jack Samra

Jack and Maria Samra

445 Sevilla Avenue, Coral Gables, Florida 33134
Tel.: 305-442-2223; Email: JackSamra@bellsouth.net

Hon. Douglas P. Woodlock
U.S. District Court
District of Massachusetts
John Joseph Moakley U.S. Courthouse
One Courthouse Way
Boston, Massachusetts 02210

Dear Judge Woodlock,

We are friends of Edward J. Tutunjian and his family. I am a Realtor based in Miami and my wife, Maria, is a public school teacher. We have known the Tutunjian's for over 15 years. In that time have spent considerable time together and grown to become close friends.

We first met Edward in Miami while he was visiting his daughter, who was then a student at the University of Miami. Since that first visit, we have come to admire Edward's honorable character, humility, and work ethic. People like Edward are rare in today's society. He is as genuine as he appears. Edward is a deeply generous and considerate man, but refuses to take credit and prefers not to be in the limelight. This is not a posture. I have witnessed this generosity and his many small kindnesses. I also know him to be an honest and forthright businessman.

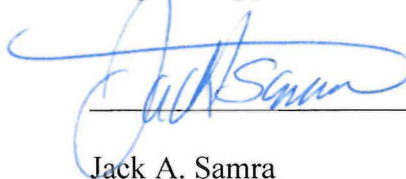
In a way, we have always identified with Edward. This perhaps explains how quickly we were able to develop a close relationship. He came to the United States with virtually nothing and raised himself up through hard work and determination. Our experiences as immigrants to the United States were very similar to Edward's. It is through this shared experience that we have come to appreciate the great opportunities and freedoms of the United States.

It is important to note as well that Edward and Nancy have raised an incredible family. They are deeply committed to their children. As parents of three boys, we have always admired the way Edward and Nancy instilled our shared values in their children. It is no wonder that their three children have grown into responsible and well-grounded adults.

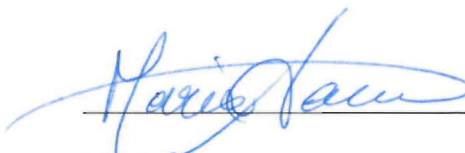
This has been a deeply challenging time for Edward and his family. We are proud to stand by them because we know Edward to be a truly good man. He has expressed to me the deep remorse and regret he feels. I know that this experience, for a man who has been so blessed by the opportunities afforded by the United States, has been profoundly difficult, but we are confident that Edward will emerge stronger and with a continued commitment to do much good. We are hopeful that Your Honor will give Edward this opportunity and consider his good character when determining his punishment in the coming weeks.

If we can be of any further assistance to Your Honor, please do not hesitate to contact either of us. Our home number is listed above. In addition, we can be reached at (305) 495-2509 (Jack) or (305) 775-3604 (Maria).

Respectfully,



Jack A. Samra



Maria Samra

To Whom it Concerns,

I'm writing this letter in support of Edward Tutunjian. We have been neighbors through our businesses for more than twenty years. In that time Eddie has proven himself to be helpful and friendly- always offering to help out when needed. The Fenway went through a very tough time when we had a devastating fire. Eddy made it known he was there to help with whatever we needed.

Sincerely,

Martin Thornton
Thorntons Fenway Grille
100 Peterborough St.
Boston, Ma.
617-435-7435

A handwritten signature in black ink, appearing to be 'MT', with a long horizontal line extending to the right.

Honorable Douglas P. Woodlock
U. S. District Court
John Joseph Moakley U. S. Courthouse
One Courthouse Way
Boston, MA. 02210

November 17, 2016

Dear Judge Woodlock,

I would like to explain to you what an unusual man my uncle, Edward Tutunjian is. My name is Armen Mahserejian and I am the son of his oldest sister. I grew up in Los Angeles and came to Boston in 1991 at the age of twenty-five. I was going through hard times and my uncle brought me here and gave me a job. Living in Boston ever since, I am married and have three daughters. Uncle Eddie started me at the bottom and now I am operations manager at the cab company. Because of the many years I have worked in close proximity to my uncle, there is not much about his personality I have not observed.

Two things stand out in my mind; Uncle Eddie is the most caring and giving person you will probably ever meet in your life and he is also the most forgiving.

Here is an example. My uncle has a cousin who until about a year ago worked at the garage for a number of years. His job was basically to man the gas pump in the garage – nothing difficult or stressful. Always a bit odd, we started noticing more erratic behavior about three years ago. It was the onset of dementia and it caused numerous headaches at the garage. Uncle Eddie kept him employed for about two years beyond what anyone else would consider doing to help his cousin and his cousin's family even though it caused much more work and chaos for him and the rest of us working at the garage. We had to supervise everything this man did, including making sure he didn't get lost coming to work.

Over the years the taxi garage has employed a number of people who contributed very little to the operation of the business but remained at their jobs only because they would have a hard time finding employment somewhere else. My uncle always gave multiple chances to drivers who were lax in their lease or gas payments, even when he knew they were taking advantage of him. It would drive the rest of us in the office crazy. But Uncle Eddie never wanted to disappoint anyone or make their ability to support their families more difficult. I know for a fact that very few people would take on these responsibilities or make these concessions out of the kindness of their heart. But Uncle Eddie always did.

He very often helped people he knew – drivers, employees, acquaintances - get their family members out of conflict areas by sponsoring them to come to America and then giving them jobs. In all the years I have been with my uncle, even when his business was much smaller I never saw any type of request for help turned away.

I cannot count how many times drivers have totaled cars and Uncle Eddie let them continue to lease his vehicles. These drivers caused him lots of expense, but Uncle Eddie also took a huge risk with them because, Heaven forbid, if they got into another accident and the taxi company was sued, the fact of their first accident put the company at a clear disadvantage. I have heard from drivers that there are

whole communities in Haiti and Nigeria where everyone there knows and blesses the name of Eddie Tutunjian. I believe it. Many drivers come from those places, earn money and send it back home. According to some drivers, these poor communities practically subsist on the money sent home by Boston Cab taxi drivers. Uncle Eddie's reputation is that of a kind and fair man who, if you make it to the U.S. will help you gain employment. Maybe they also heard of the many instances where my uncle has donated to their churches and organizations here in America.

I have never seen my uncle refuse anyone seeking a donation for any good cause whatsoever, from the Haitian churches to the neighborhood AIDS center to the Boston and State Police associations.

Uncle Eddie is the most forgiving man you will ever meet. Anyone needing help is never refused. Even people who hurt my uncle in ways big and small – and believe me, there have been some big ways – he forgives them and moves past it. There is not a mean or vindictive bone in his body. He is a wonderful role model.

Lastly, I would like to note that my uncle is a very devoted American and Bostonian. Uncle Eddie has a HUGE American flag that every Fourth of July since before I moved to Boston, he hangs from the roof across the whole front of his garage. People pose in front of our building taking pictures with it. He has helped in the creation of two City parks, Ramler Park in the Fenway area and the Armenian Heritage Park that celebrates the immigrant experience in the City of Boston on the Rose Kennedy Greenway. To cut air pollution Uncle Eddie was the first taxi owner in Boston to switch to hybrid vehicles long before it was mandated and Mayor Menino gave him an environmental award for it. Most importantly, he has been in the forefront for decades keeping the city's taxis on the road, providing transportation service to Bostonians and earning opportunities to countless drivers, mostly immigrants, living in Boston and the surrounding communities.

I have tried to shed some light on the character of my uncle in the hope that you see he is an exceptionally good man and deserving of your compassion.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Armen Mahserejian', followed by a long horizontal flourish.

Armen Mahserejian